



State of Ohio Environmental Protection Agency
Northeast District Office

US EPA RECORDS CENTER REGION 5



526379

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Bob Taft, Governor
Christopher Jones, Director

January 2, 2003

RE: **HUKILL CHEMICAL CORP.**
TSD/LQG/TRANSPORTER
OHD 001926740/#02-18-0315
CUYAHOGA COUNTY

Ms. Judy Trader
Hukill Chemical Corporation
7013 Krick Road
Bedford, OH 44146-4493

Dear Ms. Trader:

On December 17, 2002, I conducted a compliance evaluation inspection at Hukill Chemical Corporation (HCC), located in Bedford, Ohio. The purpose of the inspection was to determine HCC's compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). HCC was represented by you and Ohio EPA was represented by me. This letter will explain the violation I found, outline concerns we talked about, and discuss what you need to do to correct the violation and concerns.

Additionally, I conducted a post-closure certification inspection of the concrete cap (tank dike) that was placed over the former hazardous waste tank farm area. The concrete cap appears to be constructed as presented in the approved closure/post closure plan. Details regarding the closure certification will be discussed under separate cover.

I have enclosed copies of the inspection checklists for your records. During the inspection, I found the following violation of Ohio's hazardous waste laws:

1. ORC 3734.02(E) and (F): storing a drum of hazardous waste in an unpermitted area of the facility.

One 55 gallon drum from Bollman Hat, Manifest 55695, D001, D035, F003, F005, Prof. 5029, received 10/8/02, was being stored with non-hazardous waste drums outdoors on the East Pad near the fuels dike. The drum had been loaded onto a truck to go to Ross Incineration but was taken off the truck to use for blending instead of incineration. The manifest was corrected to reflect that the Bollman Hat drum did not go to Ross Incineration, but the drum was never placed back into the permitted container storage room and somehow ended up among drums of non-hazardous waste. The drum inventory record that I was given a copy of on December 17, 2002, incorrectly lists the drum as a non-hazardous drum.



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The violation was abated at the time of the inspection when the drum was moved into the permitted storage area. Please send me information about the final disposition of this drum, and the steps HCC will use in the future to make sure that hazardous waste does not end up being stored with non-hazardous waste and is not entered into the drum inventory as non-hazardous waste.

The following concerns were discussed:

1. The Scott Air Packs, found in the emergency equipment cabinets, need to be certified. To address this concern, please submit documentation that they have been properly certified.
2. The new labels that are being placed on incoming drums provide useful information. However, the Hukill Chemical Corporation name must be included on the label to make it clear that Hukill Chemical Corporation is the accepting TSD. Please submit a modified label that clearly shows that HCC is the accepting TSD.
3. As we have discussed in the past, drums that are being unloaded from incoming trucks that are in the "staging" phase may remain on the dock for up to 24 hours before they must be moved into the permitted container storage room. However, the drums that are being "staged" must be counted toward the total permitted drum inventory.
4. I have reviewed the Kannenberg Flash Point/GC data which was collected to verify that the Kannenberg waste stream is non-hazardous. All data verify that the waste stream is a non-hazardous waste stream. I am returning your file to you with this letter and attachments.
5. Vince Valentino, the new plant manager, needs to have documentation in his personnel file that he has received training as a new employee within 6 months of hire. Please send verification that his file reflects that he has been orientated to the facility.

Housekeeping has been routinely cited as a violation in past compliance evaluation inspections. During this inspection, I noted an improvement in housekeeping in the waste management areas. The drum process area in the container storage room and the transfer pump manifold near the fuels dike were free of pooling waste. The portable pumps used to load and unload tanker trucks were cleaner than any time in the past. Drip pans along the tank dikes used to collect leaks where hoses are coupled and uncoupled were free of waste.

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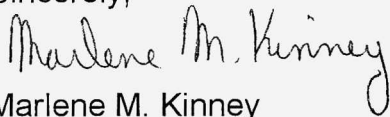
The new system of labeling the location of satellite drums, and using different colored labels for waste "in process", has made it easier to determine the contents of drums throughout the plant. In the past, it has been a problem when doing a walk through to determine if a drum was a satellite drum or a process drum. One can tell now by looking at a label or sign what type of material is in the drum.

Please submit the requested documentation within 30 days of your receipt of this letter to my attention. Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

You can find copies of the rules and other information on the hazardous waste division's web page at <http://www.epa.state.oh.us/dhwm>. Ohio EPA also has helpful information about pollution prevention at the following web address: <http://www.epa.state.oh.us/opp>.

Should you have any questions or concerns, please do not hesitate to call me at (330) 963-1162.

Sincerely,



Marlene M. Kinney
Environmental Specialist
Division of Hazardous Waste Management

MMK:cl

cc Linda Neumann, DHWM, CO
Natalie Oryshkewych, DHWM, NEDO, w/o enclosure
Regional Offsite Administrator, DE-9J, USEPA Region V, w/o enclosures